

From: Mia, Marcia
Sent: Thursday, December 20, 2018 04:57 PM
To: Marsh, Karen
CC: Hambrick, Amy; Witt, Jon; Witosky, Matthew; Branning, Amy; Mills, Derek
Subject: RE: OOOOa Reports
Attachments: Copy of OOOOa Reports Evaluation_mbm.xlsx

My thoughts.

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Marsh, Karen
Sent: Thursday, December 20, 2018 10:04 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>
Subject: RE: OOOOa Reports

Here's a basic template we could probably use and build from for an evaluation of the information. Let me know what revisions additional thoughts you have.

Karen

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Mia, Marcia

Sent: Wednesday, December 19, 2018 4:43 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>

Subject: RE: 0000a Reports

Ok, thanks for following up.

I am trying to get some contract dollars to do the review for us. I can also get a Drilling Info query done to connect the well IDs. I should know more about the contract \$\$ next week.

Marcia B Mia

Air Branch

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From: Marsh, Karen

Sent: Tuesday, December 18, 2018 10:05 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>

Subject: RE: 0000a Reports

Marcia,

I spoke with Peter at EDF on Friday regarding the low production well data they thought would be available in the compliance reports. He wasn't sure off hand that information is available in the reports to conduct the analysis they suggest in their extension request letter. However, he said if it was there, it may be in the initial compliance reports. He said they would try to provide specifics in their comment letter so once I track that down, I can send it around.

Thanks!

Karen

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Marsh, Karen

Sent: Friday, December 07, 2018 9:27 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>

Subject: OOOOa Reports

Marcia,

As I mentioned on the phone yesterday, I took a look at the EDF letter in greater detail and the assertions they were making. I also looked closer at the current CEDRI template (what people have been using if reporting to CEDRI) to see if there is information that could be used to evaluate their claims. Below is my assessment.

Ex. 5 Deliberative Process (DP)

Average Survey Time:

One area they highlight is the average survey times, stating the information "suggests fugitive monitoring costs are lower than estimated in the analysis for the NSPS." They go on to state that EPA assumes 14 hours annually per site for semiannual inspection and repair, or an average of 3.5 hours per well per survey, based on the assumption of

2 wells per site.

Ex. 5 Deliberative Process (DP)

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Ex. 5 Deliberative Process (DP)

"Site Information" Tab - Number of wells per site (Column C - site name; Column D - count of the well IDs provided)

"Fugitive Emissions Components" Tab - Affected facility (Column B), Date of survey (Column C), survey begin time (Column D), and survey end time (Column D)

Ex. 5 Deliberative Process (DP)

Low Production Sites:

EDF further asserts that "EPA's own compliance reports contain information on exponentially greater numbers of low producing sites, and would allow for an assessment of the complexity of the sites and their associated emissions."

Ex. 5 Deliberative Process (DP)

Karen

Karen R. Marsh, PE

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